



## Department of Toxic Substances Control

Edwin F. Lowry, Director  
5796 Corporate Avenue  
Cypress, California 90630



Arnold Schwarzenegger  
Governor

  
Terry Tamminen  
Agency Secretary  
Cal/EPA

April 28, 2004

**ORIGINAL**

Mr. Philip Mook  
AFRPA/DD-Norton BRAC Environmental Coordinator  
3411 Olson Street  
McCellan, California 95652-1071

REVISED DRAFT FINAL RECORD OF DECISION (ROD), OPERABLE UNIT 2 (OU2),  
MARCH AIR FORCE BASE (MAFB)

Dear Mr. Mook:

The Department of Toxic Substances Control (DTSC) received the above referenced document of MAFB on April 2, 2004. This revised Draft Final ROD addresses Installation Restoration Program (IRP) Sites 3, 6, 12, 17, 19, 20, 22, 23, 24, 25, 26, 30, 35, 40, and 42 at the former MAFB. No contaminants were found at Sites 22, 23, and 30, and the Air Force (AF) proposes no further action (NFA) for these sites. The AF performed interim removal actions at Sites 3, 6, 12, 17, 20, 24, 25, 26, 35, 40, and 42. Confirmation sampling results indicated that Sites 3, 20, 24, 25, 26, 35, 40, and 42, have been cleaned up to levels that are protective of human health and the environment. The AF therefore proposes NFA for these sites. On the other hand, the draft final ROD indicates that Sites 6, 12, 17, and 19 contain residual contamination with concentrations above the EPA residential preliminary remediation goals. These sites require institutional controls (ICs) to prevent exposure and to protect human health and the environment.

DTSC provides the following comments for your consideration.

1. Declaration, page D-1

3rd paragraph: "ICs are required to address soil and groundwater contamination at three sites and controls are required to protect waste cells on one site." The correct statement would be "ICs are required . . . at four sites, with additional controls required to protect waste cells on one of these sites."

2. Declaration, page D-5

Last paragraph: Please include landfill gas investigation as one of the required actions for Site 6.

3. Declaration, page D-6

Subtitle Sites Requiring ICs, Site 6: The revision of the Operation and Maintenance Plan should also include requirements of institutional control implementation, monitoring, reporting, and enforcement.

4. Declaration, page D-7

5th full paragraph: "The selected remedy for contaminated groundwater at Site 12 . . . ." This statement should mirror the statement about the selected remedies for Sites 6, 17 and 19 in the paragraph above. The correct statement would be "The selected remedy for contaminated groundwater (land use restrictions/institutional controls) at Site 12 . . . ."

5. Section 4.0, Scope and Role of Operable Unit 2 – AFRPA Sites, Page 4-1

Last paragraph: The statement that this ROD addresses only OU2 sites controlled by the AFRPA is not accurate because AFRPA does not currently control Sites 22, 23, 26 and 42. The statement should be corrected.

6. Table 4-1, Page 4-5

Footnote 2 refers to RCRA. The statement is not accurate and should be deleted.

7. Table 4-2, Page 4-6

Entries for Sites 3, 20, 22, 23, 25, 26, 30 and 42 (and perhaps others) should be corrected (e.g. they are not currently controlled by AFRPA or use restrictions are required or the site has been transferred or the site is leased).

This comment also applies to Table 5-1.

8. Errata pages from Phil Mook, 4-15-04, Figure 7-1: Descriptions of IC remedies at each of the sites do not match the actual restrictions of the selected remedies. This could result in confusion or disputes regarding what the restrictions actually are. The descriptions should match the selected remedy descriptions in Sections 7 and 9 or else a disclaimer should be added to Figure 7-1 (e.g. "The IC remedies

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outlined in this Figure 7-1 are more fully described in Sections 7 and 9 of this ROD.").

If you have any questions regarding this letter, please call me at (714) 484-5458.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Niou".

Stephen Niou, P.E.  
Base Closure Unit  
Southern California Branch  
Office of Military Facilities

cc: Mr. John Broderick  
Regional Water Quality Control Board  
Region 8  
3737 Main Street, #500  
Riverside, California 92501

Ms. Sheryl Lauth, SFD-8-1  
U.S. EPA, Region 9  
75 Hawthorne Street  
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April 28, 2004

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Mr. Eric Lehto  
452 SPTG/CEV  
610 Meyer Street, Bldg. 2403  
March Air Reserve Base, California 92518-2166

DRAFT FINAL RECORD OF DECISION (ROD), OPERABLE UNIT 2 (OU2), VERSION 2, MARCH AIR RESERVE BASE (MARB)

Dear Mr. Lehto:

The Department of Toxic Substances Control (DTSC) has received the Air Force's (AF) response to comments for the Draft Final OU2 ROD, Version 2 for MARB on April 2, 2004. Our previous comments on the ROD were forwarded to the AF on November 26, 2003. DTSC provides the following comments for your consideration.

1. DTSC's land use covenant regulation at title 22, California Code of Regulations, section 67393.1 should be an ARAR for this ROD and ARARs regarding institutional controls (ICs) should be included in this ROD. Please see DTSC's November 26, 2003 General Comments 3, 4, Specific Comments 19b, 21; EPA IC and ARAR Comments 1, 2.

As long as hazardous substances will remain on site at levels not suitable for unrestricted use, DTSC cannot approve a response action decision document for that site unless land use restrictions are included. The current property owner (i.e. Air Force) must comply with necessary land use restrictions as determined in the ROD. Upon transfer of the property, including transfer to another federal entity, the transfer documents must specify the necessary land use restrictions and the new owner must comply with them.

Any land use restrictions determined by the ROD to be necessary will be enforceable as a requirement in a primary document under the FFA. (See DTSC General Comment 5, Specific Comments 2, 12, 14, 15, 16, 17, 18, 19a, 20)

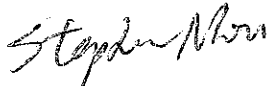
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If property transfer occurs before cleanup is completed, the transfer is an early transfer subject to prior concurrence of the State. (See CERCLA 120(h)(3)(C).)

2. General Comment #1a: In the vicinity of Building 2300, trichloroethene was detected in a monitoring well (5M8MW9) west of this building and the concentration is increasing during the past year. The one extraction well proposed by the Treatability Study Work Plan for Building 2300 may not be sufficient to remediate contaminations at that specific location. DTSC recommends that the ROD provide flexibility for extraction wells similar to that of monitoring wells.
3. "Petroleum releases are exempt from cleanup under CERCLA" should be changed to "Petroleum is excluded from the definition of hazardous substance under CERCLA." (See DTSC Specific Comment 6)
4. Revised Sections 7, 8, 9 and 10 were not provided for review. The ROD must select one of the alternatives as the remedy. It is not known whether the ROD does this. (See DTSC Specific Comments 9, 10, 25)

If you have any questions, please contact me at (714) 484-5458.

Sincerely,



Stephen Niou, PE  
Base Closure Unit  
Southern California Branch  
Office of Military Facilities

cc: Mr. John Broderick  
Regional Water Quality Control Board, Region 8  
3737 Main Street, #500  
Riverside, California 92501

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